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Complaint as of the date of this Stipulation and, while expressly reserving all their other rights and defenses, hereby waive any and all objections to service of process, including but not limited to waiving any and all objections to in personam jurisdiction based on any defect in service of the Complaint; and

2. Batratchenko's and the Thor Defendants' deadlines to respond to Plaintiff's Complaint in the above-referenced action, which would otherwise have been between February 17 and March 23, 2012, are extended until May 30, 2012, which is the first adjournment of this deadline; and

3. This stipulation may be executed in counterparts and exchanged by PDF, fax or other electronic means and such electronic counterparts shall have the same effect as if a single document had been executed and a copy thereof shall be treated as if an original for all purposes.

Dated: New York, New York
May 14, 2012

CARTER LEDYARD & MILBURN LLP

By: 

Gary D. Sesser
Alexander G. Malyshev
Judith M. Wallace

Two Wall Street
New York, New York 10005
Tel. (212) 732-3200
Fax (212) 732-3232

Attorneys for Defendants Oleg Batratchenko; Thor United Corp.; Thor Optima LLC, Thor United Corp. (Nevis); Thor Asset Management, Inc.; Thor Real Estate Management, LLC; Thor Opti-Max, LLC; Thor Capital, LLC; Thor Futures, LLC; Thor Realty LLC and Thor Realty Holdings, LLC

AKIN GUMP STRAUSS
HAUER & FELD LLP

By: 

Nancy Chung
Jane M. Dattilo

One Bryant Park
New York, New York 10036
Tel. (212) 872-1000
Fax (212) 872-1002

Attorneys for Plaintiff Ludmila Loginovskaya

SO ORDERED


Hon. J. Paul Oetken, U.S.D.J. 6/1/12